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Attorney for Renewable Energy Coalition

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF PACIFICORP DBA **ROCKY MOUNTAIN POWER'S 2013** INTEGRATED RESOURCE PLAN

CASE NO. PAC-E-13-05

Renewable Energy Coalition's Petition to Intervene

Pursuant to the Idaho Public Utilities Commission Rules of Procedure. IDAPA 31.01.01.07I-073, Renewable Energy Coalition ("Coalition"), a coalition of renewable energy project owners and developers, hereby petitions the Idaho Public Utilities Commission ("Commission") to intervene as a party in this proceeding. In support of this petition, Renewable Energy Coalition represents as follows:

1 The business address of Renewable Energy Coalition is:

> John Lowe, Director Renewable Energy Coalition 12050 SW Tremont St. Portland, OR 97225 Phone: (503) 372-6909

(503) 372-6908 Fax:

Email: jravenesanmarcos@yahoo.com

2. The Coalition will be represented in this proceeding by:

Thomas H. Nelson, Attorney at Law

PO Box 1211

Welches, OR 97067

Email: nelson@thnelson.com

Nancy Esteb, Ph.D.

PO Box 490

Carlsborg, WA 98324

Email: betseesteb@qwest.net

3. Please provide copies of all pleadings, production requests, production responses. Commission orders, and other documents to the three names and

addresses above. In accordance with IPUC Rule 31.01.01.063, electronic copies only are requested; hard copies need not be provided of any documents filed in this docket.

4. The Coalition claims a direct and substantial interest in this proceeding arising from the impact to its present and future members served by Rocky Mountain Power, and the Coalition thus has a direct and substantial interest in ensuring that the Integrated Resource Plan contains an accurate and thorough analysis of Rocky Mountain Power's future resource needs. The Coalition's intervention will not unduly broaden the issues in this proceeding.

5. The Coalition intends to fully participate in this matter as a party. The nature and quality of the Coalition's intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary the Coalition may advocate for a technical hearing and introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses.

WHEREFORE, Renewable Energy Coalition respectfully requests that the Commission grant its petition to intervene as a party in this proceeding.

Dated this 1<sup>st</sup> day of August, 2013.

Respectfully submitted, Thomas H. Nelson

THOMAS H. NELSON Attorney for Renewable Energy Coalition

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of August, 2013, I caused to be served a true and correct copy of the foregoing document to each of the following via the method so indicated:

Jean D. Jewell, Secretary (original and 7) Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 jjewell@puc.state.id.us

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